

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROSELYN JOHNSON,

Plaintiff,

- against -

CATHOLIC CHARITIES COMMUNITY SERVICES, ARCHDIOCESE OF NEW YORK, (Individually and As Successor), PIUS XII-YOUTH AND FAMILY SERVICES, JOHN MANCUSO (Individually and As Agent of Employers), EVE KAGLE (Individually and As Agent of Employers), COLIN JARVIS (Individually and As Agent of Employers), PATRICE BEY (Individually and As Agent of Employers), and "JANE DOE" and "JOHN DOE" (Individually and As Agent of Employers), being any persons unknown,

Defendants.

Case No. 07 civ 6718 (RJH)

PROPOSED SCHEDULING ORDER

The parties to this litigation, by and through their respective attorneys, having complied with the requirements of Rule 26(f) by attending a meeting to discuss and plan for discovery on December 12, 2007, do hereby submit the following outline as their joint discovery plan:

1. Amendments to Pleadings. The parties may amend pleadings on or before June 1, 2008. The parties may join additional parties on or before June 1, 2008.
2. Pre-Discovery Disclosures. The parties agreed that the information required by Fed. R. Civ. P. 26(a)(1) will be exchanged by February 11, 2008.
3. The parties have agreed on the following proposed discovery schedule and plan:
 - a. The parties jointly propose that all discovery, other than expert discovery, will be completed by June 1, 2008.

- b. The parties propose that written discovery and depositions will be governed by the Federal Rules of Civil Procedure.
- c. The parties propose that the deposition of plaintiff will be held on April 22, 2008 and that the depositions of defendants will commence on April 23, 2008.
- d. The parties propose July 1, 2008 for plaintiff's expert disclosure and August 15, 2008 for defendants' expert disclosure and September 15, 2008 for the close of expert discovery.

4. Other Items:

- a. The parties consent to proceed before the Magistrate Judge through discovery.
- b. The parties will schedule a settlement conference with the Magistrate Judge. Plaintiff will submit a settlement proposal to defendants for their consideration.
- c. All potential dispositive motions should be filed by October 1, 2008 or 60 days after the close of discovery should the discovery deadline be extended.
- d. The parties propose November 15, 2008 as a date for filing a final pretrial order.
- e. The plaintiff has requested a jury trial. The parties anticipate the trial duration will be ten (10) days. The parties anticipate that the case will be ready for trial by December 15, 2008.

s/_____
Robert L. Lowe, Esq. (RL1987)
Attorney for Plaintiff

s/_____
Veronica L. Reed (VR1790)
Traub Lieberman Straus & Shrewsberry LLP
Attorneys for Defendants

Date: _____

United States District Court Judge